0000 20278



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION VIII

999 18th STREET - SUITE 500 DENVER, COLORADO 80202-2405

NOV 15 1991

Ref: 8HWM-FF

Mr. Frazer Lockhart U.S. Department of Energy Rocky Flats Office P.O. Box 928 Golden, CO 80402-0928

RE: Ecology Standard

Operating Procedures

Dear Mr. Lockhart:

We have reviewed the Category 1 and 2 Ecology Standard Operating Procedures (SOPs) which were transmitted to EPA on October 15, 1991. Our review focused primarily on the adequacy of the SOPs in responding to our conditions of approval for the documents as stated in our letter to you of August 30, 1991.

In general, we believe the SOPs demonstrate that DOE has developed an adequate procedure for ensuring that threatened, endangered, and other special status species are treated appropriately during field activities at the Rocky Flats Plant. Therefore, the Ecology SOPs are approved. However, the reason for submitting two .separate documents is not clear. EPA believes that the SOPs would be more usable as a single document because much of the information is repeated unnecessarily. We have enclosed a number of additional comments which we believe will improve the accuracy and consistency of the SOPs. While these comments are not conditions for approval, they should be seriously considered by DOE and addressed in future revisions of the SOPs.

If you have any questions about the enclosed comments, please contact Bonnie Lavelle at (303) 294-1067.

Sincerely,

Martin Hestmark, Manager Rocky Flats Project

Enclosure

DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICE

cc: Bruce Thatcher, DOE
Larry Woods, EG&G
Bruce Hope, EG&G
Gary Baughman, CDH/HMWMD
Barbara Barry, CDH/RFPU
Andrew Archuleta, USFWS